

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10718-RGS

---

STEVEN HORNE and	)
RONALD BROWN,	)
	)
PLAINTIFFS	)
	)
v.	)
	)
CITY OF BOSTON,	)
SGT. ERIC BULMAN, and	)
SGT. JOHN DAVIN,	)
	)
DEFENDANTS	)

---

**DECLARATION OF KENNETH ISREAL**

I, Kenneth Isreal, hereby declare as follows:

1. I was employed as an uniformed Police Officer for the Boston Police Department for the City of Boston from September 8, 1993 to January 2006. I am an African American. From approximately the Fall of 1996 until January 2006, when I retired, I was assigned to the Youth Violence Strike Force ("YVSF"), previously known as the Anti-Violence Gang Unit, of the Boston Police Department. While with the YVSF, I came to know the Plaintiffs, Officers Steven Horne and Ronald Brown, the Defendants Sgt. Eric Bulman and Sgt. John Davin, as well as their superior officers at the time, Lt. French, Lt. Foley, Deputy

Superintendent Thomas Dowd, as well as the other officers and supervisors of the YVSF at that time. As such, I have personal knowledge of the matters set forth in this Affidavit.

2. During my assignment to the YVSF, the white officers rode in cruisers with white officers and black and other minority officers rode together.

3. In February 2000, I learned from Plaintiff Officers Ronald Brown and Steven Horne, who I knew then and know now, as well as from other YVSF officers at the time, both black and white, that Horne and Brown complained to the YVSF Commander, Lt. Gary French, about many of the racial issues in the YVSF and some racial tension then took place in the unit. There was an "A team - B team mentality" within the unit, meaning the white officers were on the A team (especially a clique of Sgt. Bulman and white Officers Ridge, Albert, Fayles, among others) and the minority officers were on the B team. Although previously then minority officers had discussed and complained among themselves about the racial issues in the YVSF, this was the first time any officers had actually taken the issues to a complaint level to the YVSF commander.

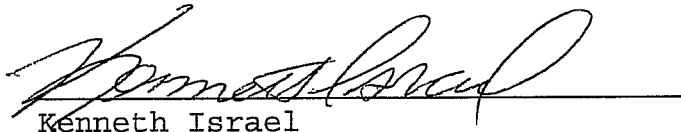
4. After Horne and Brown complained, the morale of the minority officers worsened and the attitude of white officers toward Horne and Brown was that they were outcasts until they

were transferred out of the unit.

5. While with the YVSF I was starting an overtime tour of duty with a white YVSF officer (one of the unusual times I rode with a white officer, i.e. on overtime duty) who called a black driver a "nigger" who had cut us off in traffic as we were in a cruiser leaving the YVSF headquarters at 364 Warren Street, Roxbury. I then refused to continue to ride with the white officer.

6. During my service in the Department, I never underwent a personal evaluation of any kind by any of my supervisors. I have never heard the expression "PAM" evaluation and none was conducted on me.

Pursuant to 28 U.S.C. §1746, I declare under the penalties of perjury that the foregoing is true and correct.

A handwritten signature in cursive script, appearing to read "Kenneth Israel", written over a horizontal line.

Kenneth Israel

August 23, 2006